

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF CALIFORNIA

IN RE: UBER TECHNOLOGIES, INC.,
PASSENGER SEXUAL ASSAULT
LITIGATION

Case No. 23-md-03084-CRB

**[PROPOSED] ORDER GRANTING
PLAINTIFF'S MOTION CONCERNING
TRIAL WITNESSES**

This Document Relates to:

Jaylynn Dean v. Uber Techs., Inc.,
N.D. Cal. No. 23-cv-06708
D. Ariz. No. 25-cv-4276

Having considered Plaintiff's Motion to Preclude Uber from Cherry-Picking Corporate Trial Witnesses and From Calling at Trial Late-Disclosed Witnesses, the Court hereby **GRANTS** the motion and **ORDERS** as follows:

1. Uber must produce Gus Fuldner, Katy McDonald, and Sunny Wong to testify live at the *Dean* trial, or will be precluded from offering live testimony from any current or former Uber employee, contractor, or consultant outside the subpoena power of the Court.
2. Within 24 hours, Uber must either inform Plaintiffs that Mr. Fuldner, Ms. McDonald, and Mr. Wong will be made available for trial, or serve a revised witness list that excludes live testimony from any current or former Uber employee, contractor, or consultant outside the subpoena power of the Court.
3. Due to Uber's failure to timely disclose Todd Gaddis or Chad Dobbs as witnesses, and such nondisclosures being neither substantially justified nor harmless, Mr. Gaddis and Mr. Dobbs may not testify live in the *Dean* trial.

IT IS SO ORDERED.

Dated: _____

Hon. Charles R. Breyer
United States District Judge